

The Hon. John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH WARREN RHULE and  
KENNETH JOHN RHULE,

Defendants.

No. CR20-105-JCC

**NOTICE REGARDING FORFEITURE**

The United States, by and through its undersigned counsel, hereby gives notice that the Department of Homeland Security, Customs and Border Protection has administratively forfeited the following property, which Defendant Kenneth Warren Rhule and Defendant Kenneth John Rhule agreed to forfeit in their Plea Agreements (Dkt. Nos. 123, ¶ 12 & 127 ¶ 12, respectively):

1. The following property, seized on or about March 10, 2020, from Defendant Kenneth Warren Rhule's residence in Bothell, Washington:
  - a. One 2016 Dark Gray Tesla Model S, VIN: 5YJSA1E22FF117465, bearing Washington State License Plate BOS0948;
  - b. Approximately 89 silver bars and coins; and
  - c. Approximately \$42,000 in U.S. currency;

2. Approximately \$593 in U.S. currency seized on or about March 10, 2020, from Defendant Kenneth Warren Rhule in or around Bothell, Washington;
3. One 2015 black GMC Sierra pick-up truck with topper and lift kit, VIN: GT12ZE86FF149097, bearing Washington State license plate C30354L, seized on or about March 10, 2020;
4. The following property seized on or about March 13, 2020 from the aforementioned GMC Sierra pick-up truck:
  - a. Approximately \$32,339 in U.S. currency;
  - b. One Western Union money order in the amount of approximately \$499 in U.S. funds; and
  - c. Two American Express gift cards with a combined value of approximately \$250.83 in U.S. funds;
5. The following property, seized on or about March 10, 2020, from Defendant Kenneth John Rhule's residence in Monroe, Washington:
  - a. Approximately \$2,500 in U.S. currency; and
  - b. Approximately \$430 in U.S. currency.

The Department of Homeland Security, Customs and Border Protection has also administratively forfeited the following property, which Defendant Kenneth Warren Rhule agreed to forfeit in his Plea Agreement (Dkt. No. 123, ¶ 12) and Defendant Kenneth John Rhule abandoned in his Plea Agreement (Dkt. No. 127, ¶ 14):

- a. Approximately 5.12094153 bitcoin; and
- b. Approximately 23.46324478 bitcoin.

*See Exhibits A-K.*

Additionally, in their plea agreements, Defendants agreed to forfeit a Smith & Wesson M&P 9mm handgun, serial number DTV6454, which was determined to be stolen. Dkt. Nos. 123, ¶ 12 & 127 ¶ 12. This handgun is currently in the custody of the Seattle Police Department and will be processed pursuant to its regulations and procedures.

1 Thus, the United States will not be pursuing any additional process to judicially forfeit  
2 the above-described property in this proceeding.

3  
4 DATED this 10th day of May, 2022.

5  
6 Respectfully submitted,

7 NICHOLAS W. BROWN  
8 United States Attorney

9 s/ Krista K. Bush  
10 KRISTA K. BUSH  
11 Assistant United States Attorney  
12 United States Attorney's Office  
13 700 Stewart St., Suite 5220  
14 Seattle, WA 98101  
15 (206) 553-2242  
16 Krista.Bush@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on May 10, 2022, I electronically filed the foregoing Notice Regarding Forfeiture with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

s/ Donna R. Taylor  
DONNA R. TAYLOR  
FSA Paralegal III, Contractor  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, WA 98101  
(206) 553-4132  
Donna.R.Taylor@usdoj.gov



# **EXHIBIT A**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at more than \$5,000)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) as required by law on the following dates: 04/24/2020 to 05/23/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00010000; Seized On 03/10/2020 At the port of SEATTLE; Dark gray 2016 Tesla Model S; 5yjsa1e22ff117465; 1; EA; Valued at \$33500; For violation of 18 USC 981(a)(1)(C), 18 USC 1956(c)(7), 18 USC 1961(1)

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

Forfeiture Date: 06/24/2020

# **EXHIBIT B**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at more than \$5,000)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) as required by law on the following dates: 09/25/2020 to 10/24/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED]

[REDACTED]

[REDACTED] 00110000; Seized On 03/11/2020 At the port of SEATTLE; Silver Bars / Coins; ; 89; EA; Valued at \$1600.85; For violation of 21 USC 881(a)(6), 21 USC 881(b), 18 USC 981(a)(1), 18 USC 1960, 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 959

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

**Forfeiture  
Date:** 11/25/2020

# **EXHIBIT C**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at more than \$5,000)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) as required by law on the following dates: 09/25/2020 to 10/24/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00050000; Seized On 03/11/2020 At the port of SEATTLE; US Currency converted to a cashiers check; ; 1379; EA; Valued at \$42000; For violation of 18 USC 981(a)(1), 18 USC 1956(a)(1), 18 USC 1960, 18 USC 981(a)(1), 18 USC 1960, 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 841

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

**Forfeiture** 11/25/2020

**Date:**

# **EXHIBIT D**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at \$5,000 or less)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) and posted at the SEATTLE U.S. CBP / ATTN:FPFO 1000 SECOND AVE, STE 2100, SEATTLE, WA, 981041049 as required by law on the following dates: 09/25/2020 to 10/24/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00060000; Seized On 03/11/2020 At the port of SEATTLE; US Currency; ; 34; EA; Valued at \$593; For violation of 18 USC 981(a)(1), 18 USC 1960, 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 841, 18 USC 981(a)(1), 18 USC 1956(a)(1), 18 USC 1960, 21 USC 841

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

**Forfeiture**      11/25/2020

**Date:**



# **EXHIBIT E**

U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at more than \$5,000)

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) as required by law on the following dates: 04/24/2020 to 05/23/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00010000; Seized On 03/13/2020 At the port of SEATTLE; 2015 BLACK GMC SIERRA PICK-UP TRUCK WITH TOPPER AND LIFT KIT; 1GT12ZE86FF149097; 1; EA; Valued at \$30100; For violation of 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 846

[REDACTED]

[REDACTED]

DIANA  
WAGNER

Fines, Penalties & Forfeitures Officer

Forfeiture Date: 06/24/2020

Date:

# **EXHIBIT F**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at more than \$5,000)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) as required by law on the following dates: 04/24/2020 to 05/23/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00020000; Seized On 03/13/2020 At the port of SEATTLE;  
US\$32,339.00 CASH (CONVERTED INTO CASHIER'S CHECK); ; 1511; EA; Valued at  
\$32339; For violation of 18 USC 981(a)(1)(C), 18 USC 1956(c)(7), 18 USC 1961(1)

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

**Forfeiture**      06/24/2020

**Date:** \_\_\_\_\_

# **EXHIBIT G**

U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at \$5,000 or less)

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) and posted at the SEATTLE U.S. CBP / ATTN:FPFO 1000 SECOND AVE, STE 2100, SEATTLE, WA, 981041049 as required by law on the following dates: 04/24/2020 to 05/23/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00040000; Seized On 03/13/2020 At the port of SEATTLE;  
WESTERN UNION MONEY ORDER: \$499.00; ; 499; EA; Valued at \$499; For violation  
of 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 846

DIANA  
WAGNER



Fines, Penalties & Forfeitures Officer

Forfeiture Date: 06/24/2020

Date:

# **EXHIBIT H**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at \$5,000 or less)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) and posted at the SEATTLE U.S. CBP / ATTN:FPFO 1000 SECOND AVE, STE 2100, SEATTLE, WA, 981041049 as required by law on the following dates: 04/24/2020 to 05/23/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00100000; Seized On 03/13/2020 At the port of SEATTLE;  
AMERICAN EXPRESS GIFT CARD; ; 2; EA; Valued at \$1; For violation of 18 USC 981  
(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 963

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

**Forfeiture**      06/24/2020

**Date:** \_\_\_\_\_



# **EXHIBIT I**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at \$5,000 or less)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) and posted at the SEATTLE U.S. CBP / ATTN:FPFO 1000 SECOND AVE, STE 2100, SEATTLE, WA, 981041049 as required by law on the following dates: 06/12/2020 to 07/11/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00490000; Seized On 03/10/2020 At the port of SEATTLE; Cashiers Check Representing \$2,500 U.S. Currency; ; 25; EA; Valued at \$2500; For violation of 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 959

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

**Forfeiture**      08/12/2020  
**Date:** \_\_\_\_\_

# **EXHIBIT J**

U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at \$5,000 or less)

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) and posted at the SEATTLE U.S. CBP / ATTN:FPFO 1000 SECOND AVE, STE 2100, SEATTLE, WA, 981041049 as required by law on the following dates: 06/12/2020 to 07/11/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00500000; Seized On 03/10/2020 At the port of SEATTLE;  
Cashier's Check Representing \$430.00 U.S. Currency; ; 13; EA; Valued at \$430; For  
violation of 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC  
959

DIANA  
WAGNER



Fines, Penalties & Forfeitures Officer

Forfeiture Date: 08/12/2020

# **EXHIBIT K**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CUSTOMS AND BORDER PROTECTION  
DECLARATION OF ADMINISTRATIVE FORFEITURE  
(Property Valued at more than \$5,000)**

Case Number: [REDACTED]

Notice of Seizure and Intent to Forfeit was published at [www.forfeiture.gov](http://www.forfeiture.gov) as required by law on the following dates: 07/31/2020 to 08/29/2020

In accordance with the provisions of Title 19, United States Code, Sections 1607 and 1609 (19 U.S.C. §§ 1607, 1609) and Title 19, Code of Federal Regulations, Section 162.45 (19 C.F.R. § 162.45), the following described property is declared forfeited for violation(s) as listed below.

[REDACTED] 00510000; Seized On 03/10/2020 At the port of SEATTLE;  
Bitcoin: 5.12094133BTC (\$40,655.00); ; 1; EA; Valued at \$40655; For violation of 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 959

[REDACTED] 00520000; Seized On 03/10/2020 At the port of SEATTLE;  
Bitcoin: 23.46324515 BTC (\$186,274.00); ; 1; EA; Valued at \$186274; For violation of 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(D), 21 USC 959

**DIANA  
WAGNER**



Fines, Penalties & Forfeitures Officer

Forfeiture      10/01/2020

Date: \_\_\_\_\_